

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

STEFAN WOODSON,

Plaintiff,

v.

Case No. 3:13CV134 REP

CITY OF RICHMOND, VIRGINIA, *et al.*

Defendants.

**PLAINTIFF'S EXPERT DISCLOSURES**  
**PURSUANT TO FRCP 26(a)(2)**

Plaintiff Stefan Woodson, by counsel, hereby discloses the following experts and treating physicians in accordance with Rule 26(a)(2) of the Federal Rules of Civil Procedure. Mr. Woodson is in active treatment. Some or all of the treating physicians listed below may testify at the trial of this matter.

**I. RETAINED EXPERTS**

- 1. Susan Riddick-Grisham, RN, BA, CCM, CLCP  
Life Care Manager, L.L.C.  
3126 West Cary Street, #137  
Richmond, VA 23221**

Nurse Grisham is a registered nurse and certified life care planner retained to provide a realistic projection of the likely and casually related future care needs of Plaintiff. Nurse Grisham opinions will be given to a reasonable degree of certainty, and are more fully set forth in the attached Life Care Plan for Stefan Woodson. Plaintiff hereby incorporates the contents of the attached Life Care Plan for Stefan Woodson (**Exhibit A**), Susan Riddick-Grisham CV (**Exhibit B**), and Susan Riddick-Grisham retainer and invoice (**Exhibit C**), into this disclosure as if fully set forth herein.

As discovery in this case is ongoing, Plaintiff reserves the right to submit any and all additional information developed in discovery to Ms. Grisham for consideration and supplementation of her report. Plaintiff further reserves the right to submit to Ms. Grisham, any new reports, opinions, testimony or other records created by or for any of the Plaintiff's treating physicians and clinicians in this case. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Ms. Grisham in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Nurse Grisham's opinions in this case will be expressed in conjunction with her areas of expertise and will be offered to a reasonable degree of certainty. Plaintiff reserves Nurse Grisham's right to explain or enlarge the opinions set forth in the attached report during testimony at deposition or trial. Plaintiff reserves Nurse Grisham's right to use demonstrative evidence, illustrations, video, charts, or other reasonable means to assist the trier of fact in understanding her opinions in this case.

**2. Marc F. Stern, MD, MPH**  
**Consultant in Correctional Health Care**  
**1100 Surrey Trace Drive, SE**  
**Tumwater, Washington 98501**

Dr. Stern is a medical doctor and an expert in correctional medicine. He has been retained by Plaintiff to review and opine regarding the adequacy of care provided to Plaintiff while housed in the Richmond City Jail, to opine regarding minimum standards for correctional healthcare practices, and to provide an opinion on the causation of Plaintiff's heat stroke. Plaintiff hereby incorporates information set forth in the attached Expert Medical Report for Stefan Woodson (**Exhibit D**) and Marc F. Stern CV (**Exhibit E**) as if fully set forth herein.

As discovery in this case is ongoing, Plaintiff reserves the right to submit any and all additional information developed in discovery to Dr. Stern for consideration and supplementation of his report. Plaintiff further reserves the right to submit any new reports, opinions, testimony or other records created by or for any of the Plaintiff's treating physicians and clinicians in this case to Dr. Stern. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Dr. Stern in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Dr. Stern's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of medical certainty. Plaintiff reserves Dr. Stern's right to explain or enlarge the opinions set forth in the attached report during testimony at deposition or trial. Plaintiff reserves Dr. Stern's right to use demonstrative evidence, illustrations, video, animations, charts, or other reasonable means to assist the trier of fact in understanding his opinions in this case.

**3. Applied Climatologists, Inc.**  
**Laurence Kalkstein, Ph.D.**  
**896 Banyan Court**  
**Marco Island, FL 34145**  
**\$500 hourly rate**

**David Sailor, Ph.D.**  
**Department of Mechanical and Materials Engineering**  
**Portland State University**  
**P.O. Box 751**  
**Portland, OR 97207**

Per the August 29, 2014 Consent Order regarding discovery this disclosure is forthcoming on September 8, 2014.

**4. Larry A. Lynch, Ph.D.  
L.A. Lynch & Associates  
49 Hawthorn Road  
Salem, Virginia 24153**

Dr. Lynch is an economist with expertise in economics generally and in calculating the present value of future medical cost projections. He has been retained by Plaintiff to review and opine regarding the present value considerations relative to Plaintiff's future care projections as set forth in Nurse Grisham's Life Care Plan. Plaintiff hereby incorporates the information set forth in the attached Economic Report (**Exhibit F**), Tables (**Exhibit G**) Larry A. Lynch CV (**Exhibit H**), and Prior Testimony (**Exhibit I**), as if fully set forth herein.

As discovery in this case is ongoing, Plaintiff reserves the right to submit any and all additional information developed in discovery to Dr. Lynch for consideration and supplementation of his report. Plaintiff further reserves the right to submit any amended life care plans to Dr. Lynch for updated valuation. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Dr. Lynch in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Dr. Lynch's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of certainty.

**5. Dee Stewart, RN, MSN  
Assistant Professor, Nursing, Jefferson College of Health Sciences  
920 South Jefferson Street  
Roanoke, Virginia 24031**

Nurse Stewart is a Registered Nurse and Professor of Nursing and an expert in nursing standards. She has been retained by Plaintiff to review and opine regarding the adequacy of nursing care provided to Plaintiff while housed in the Richmond City Jail and to opine regarding minimum standards for nursing practices. Plaintiff hereby incorporates information set forth in

the attached Expert Nursing Report for Stefan Woodson v. City of Richmond, et al. (**Exhibit J**) and Dee Stewart CV (**Exhibit K**) as if fully set forth herein.

As discovery in this case is ongoing, Plaintiff reserves the right to submit any and all additional information developed in discovery to Nurse Stewart for consideration and supplementation of her report. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Nurse Stewart in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Nurse Stewart's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of certainty. Plaintiff reserves Nurse Stewart's right to explain or enlarge the opinions set forth in the attached report during testimony at deposition or trial.

**6. Jeff Eiser**  
**Jail Operations and Corrections Expert**  
**Cincinnati, Ohio 45251**

Per the August 29, 2014 Consent Order regarding discovery this disclosure is forthcoming on September 8, 2014.

**7. Chadwick Bowman**  
**Phillip Fincher, CIH, CSP**  
**The EI Group, Inc.**  
**4186 Innslake Drive**  
**Glen Allen, Virginia 23060**

Mr. Bowman and Mr. Fincher, as members of The EI Group, Inc., are experts in evaluating and analyzing indoor environmental conditions, including data gathering and analysis of indoor air quality conditions. The EI Group, Inc., was retained in this case to collect temperature and humidity data in the Richmond City Jail during the month of July 2014, and to provide an Indoor Air Quality Assessment based on the data collection. The findings and

opinions set forth and in conjunction with this Indoor Air Quality Assessment will be given to a reasonable degree of certainty. Plaintiff hereby incorporates the attached Indoor Air Quality Assessment (**Exhibit L**), CV (**Exhibit M**), and List of Cases (**Exhibit N**) as fully integrated in this disclosure.

All of Mr. Bowman's and Mr. Fincher's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of certainty. Plaintiff reserves Mr. Bowman's and Mr. Fincher's right to explain or enlarge the opinions set forth in the attached report during testimony at deposition or trial. Plaintiff reserves Mr. Bowman and Mr. Fincher's right to use demonstrative evidence, illustrations, video, animations, charts, or other reasonable means to assist the trier of fact in understanding any of their opinions in this case.

## **II. TREATING HEALTH CARE PROFESSIONALS**

### **1. William Walker, MD MCV Hospital, VCU Health System PO Box 980677 Richmond, VA 23398**

Dr. Walker is a medical doctor who specializes in Physical Medicine and Rehabilitation. He has clinical expertise in Neurologic Rehabilitation and Traumatic Brain Injury. Dr. Walker treated Mr. Woodson following his July 9, 2012 heat stroke. Dr. Walker is expected to testify in conformity with his medical notes, records and reports that have been previously produced, and the records and reports of VCU Health System.

Dr. Walker is expected to testify that Mr. Woodson was admitted to VCU Health System on July 9, 2012 with hyperthermia and altered mental status and registered an internal

temperature of 42.5 degree Celsius (108.5 degree Fahrenheit). He is expected to testify that Mr. Woodson's hyperthermia caused Mr. Woodson to develop encephalopathy and multi-organ failure with secondary hypoxic/ischemic brain injury. Dr. Walker is expected to testify that Mr. Woodson came under his care as an inpatient on VCU Health System's brain injury rehabilitation unit from July 24, 2012 through August 30, 2012 (including a brief interruption for transfer back to ICU from August 3, 2012 through August 7, 2012). Dr. Walker is further expected to testify that Mr. Woodson remains under his care following discharge from the hospital for management of his residual impairments, functional deficits, and comorbidities.

Dr. Walker is expected to opine to a reasonable degree of medical certainty that Mr. Woodson's primary diagnosis is acquired brain-injury, hypoxic-ischemic type suffered directly as a result of and proximately caused by a heat stroke occurring while Mr. Woodson was confined at the Richmond City Jail.

Dr. Walker is expected to testify that Mr. Woodson's heat stroke also resulted in complications such as aspiration pneumonia and bowel incontinence, DVT, and renal failure. He will further testify that Mr. Woodson continues to suffer from complications such as severe global ataxia, speech dysarthria, urinary incontinence, cognitive deficits, acquired nystagmus, muscle pains, neuropathic foot pain, and insomnia as a result of the heat stroke. Dr. Walker is expected to describe Mr. Woodson's related functional deficits to include dependence on others for instrumental activities of daily living, dependence on a wheelchair for mobility, and that he has a high fall risk when out of his wheelchair. Dr. Walker is expected to testify that these symptoms and deficits are likely permanent, and are a direct result of the subject heat stroke. He is expected to opine specifically with regard to the duration and nature of Mr. Woodson's heat stroke related disabilities. Dr. Walker is expected to testify that Mr. Woodson will need ongoing

neurological therapy at our through a facility such as the Tree of Life, lifelong nursing care, lifelong counselling and/or psychiatric treatment for related emotional/psychiatric conditions, lifelong medication management, and other lifelong treatment as a direct and proximate result of the subject heat stroke.

Dr. Walker is expected to testify that the Life Care Plan for Stefan Woodson (**Exhibit A**) is appropriate, medically necessary, and causally related to the subject heat stroke.

Dr. Walker is expected to testify that diagnostic testing, rehabilitation, diagnostics, office visits, surgeries, medications prescribed, and other treatment provided by or at the direction of and/or under the supervision of Dr. Walker were reasonable, necessary, and causally related to Mr. Woodson's July 2012 heat stroke.

As Dr. Walker's treatment in this case is ongoing, Plaintiff reserves the right to submit any new reports, opinions, testimony or other records created by Dr. Walker. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Dr. Walker in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Dr. Walker's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of medical certainty. Plaintiff reserves Dr. Walker's right to explain or enlarge his opinions during testimony at deposition or trial. Plaintiff reserves Dr. Walker's right to use demonstrative evidence, illustrations, video, animations, charts, or other reasonable means to assist the trier of fact in understanding his opinions in this case.

**2. Harold Green, M.D.**  
**Primary Health Associates**  
**2421 Chamberlayne Avenue**  
**P.O. Box 26329**



**Richmond, VA 23260-6329**

Dr. Green is a medical doctor who has treated Mr. Woodson following his July 9, 2012 brain injury. Dr. Green also treated Mr. Woodson for many years preceding the July 2012 brain injury as his primary care physician. Dr. Green is expected to testify in conformity with his medical notes, records and reports, and the records and reports of Primary Health Associates as well any radiology, lab, or other diagnostic tests which he ordered, oversaw and/or reviewed.

Dr. Green is expected to testify that Mr. Woodson suffered a brain injury as a result of his conditions of confinement in the Richmond City Jail. He is expected to testify that this brain injury resulted in memory and gait problems, ataxia, slurred speech, kidney failure, left facial weakness, anxiety, depression, foot pain, insomnia, and other complications. He will further testify that he was aware that Mr. Woodson previously suffered from high blood pressure, cholesterol, chronic back pain, and heart problems, but is expected to opine that the symptoms associated with the brain injury are distinguishable from these pre-existing conditions. He is expected to differentiate between the physical, cognitive and functional limitations that Mr. Woodson had prior to his July 2012 brain injury and subsequent to it. He is further expected to opine that Mr. Woodson's brain injury and related disabilities are permanent.

Dr. Green is expected to testify that diagnostic testing, office visits, surgeries, medications prescribed, and other treatment provided by or at the direction of Dr. Green were reasonable, necessary, and causally related to Mr. Woodson's July 2012 brain injury.

As Dr. Green's treatment in this case is ongoing, Plaintiff reserves the right to submit any new reports, opinions, testimony or other records created by Dr. Green. Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from

Dr. Green in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Dr. Green's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of medical certainty. Plaintiff reserves Dr. Green's right to explain or enlarge his opinions during testimony at deposition or trial.

**3. Alan Katz, Ph.D.  
NeuroRestorative Virginia  
1510 Seneca Drive  
Blacksburg, VA 24060**

Dr. Katz is a licensed clinical psychologist and clinical neuropsychologist who has cared for Mr. Woodson during his inpatient rehabilitation at NeuroRestorative Virginia in Blacksburg, Virginia.

Dr. Katz is expected to testify regarding Mr. Woodson's ongoing cognitive, emotional, functional, and physical deficits and complications related to his 2012 heat stroke. Dr. Katz is expected to testify in conformity with his reports and the records maintained by NeuroRestorative Virginia relative to the care and treatment of Mr. Woodson.

Dr. Katz is expected to opine that Mr. Woodson's symptoms are related to an acquired brain injury he suffered following hyperthermic and anoxic injuries sustained as a result of a heat stroke at the Richmond City Jail. Dr. Katz is expected to opine that Mr. Woodson has awareness deficits, Dysexecutive Syndrome, cognitive disorder, depression and personality disorder with antisocial features as a direct causal result of his 2012 heat stroke.

Dr. Katz is expected to discuss how Mr. Woodson's physical limitations affect his emotional well-being, outlook on his future, goals, and potential to fatigue. He will testify that Mr. Woodson is learning to cope with the possibility that he will never walk again due to his brain injury and resulting physical and neurological limitations. He is expected to testify that

Mr. Woodson expresses both sadness over his losses due to the heat stroke, but also hope that he will be able to live a modified life and care for his family in the future. He is expected to testify that Mr. Woodson focuses on his ability to care for his son and daughter, and to perhaps start a screen-printing business in the future, if possible.

Dr. Katz is expected to testify that Mr. Woodson is in denial regarding the connection between his physical deficiencies and his acquired brain injury, and further refuses to accept that he suffered a brain injury at all. Dr. Katz is expected to testify that Mr. Woodson displays irritability when discussing his brain injury.

Dr. Katz is expected to testify that his treatment of Mr. Woodson is directly causally related to his July 2012 heat stroke.

All of Dr. Katz opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of certainty. Plaintiff reserves Dr. Katz' right to explain or enlarge his opinions during testimony at deposition or trial. Plaintiff reserves Dr. Katz' right to use demonstrative evidence, illustrations, video, animations, charts, or other reasonable means to assist the trier of fact in understanding his opinions in this case.

**4. William N. Roberts, Jr., MD**  
**University of Louisville Health Care Outpatient Center**  
**401 E Chestnut St**  
**Suite 310**  
**Louisville, KY 40202**

Dr. Roberts is a medical doctor who specializes in Rheumatology. Dr. Roberts treated Mr. Woodson following his July 9, 2012 heat stroke. Dr. Robert's is expected to testify in conformity with his medical notes, records and reports that have been previously produced, and the records and reports of VCU Health System.

Dr. Roberts is expected to testify that Mr. Woodson was admitted to VCU Health System on July 9, 2012 with hyperthermia, respiratory failure, renal failure, rhabdomyolysis and altered mental status. He is expected to testify that upon admission, Mr. Woodson registered an internal temperature of 42.5 degree Celsius (108.5 degree Fahrenheit). He is expected to testify that he diagnosed Mr. Woodson with acute heat stroke, acute altered mental status and hyponatremia.

Dr. Roberts is expected to testify that on July 9, 2012, at approximately 2:15 p.m., Mr. Woodson was transferred to the ICU. Dr. Roberts is expected to testify that the conditions causing imminent or life threatening deterioration to Mr. Woodson were: respiratory failure secondary to altered mental status, hyperthermia, renal failure, and rhabdomyolysis. Dr. Robert's is expected to confirm that a note was made confirming that Mr. Woodson had been in a jail without air-conditioning with temperatures over 100°F for the past few days.

Dr. Roberts is expected to testify that from July 10 through July 12, 2012, Mr. Woodson remained intubated and unresponsive with no spontaneous movements or corneal reflexes, was profoundly encephalopathic, and did not respond to verbal stimuli. Dr. Roberts is also expected to testify that the medical team also began treatment for aspiration pneumonia, which was directly caused by his July 2012, heat stroke event and resulting symptomology. Dr. Roberts is expected to testify regarding the progression of Mr. Woodson's condition while under his care and the care those under his direction.

Dr. Roberts is expected to opine to a reasonable degree of medical certainty that Mr. Roberts heat stroke was as a result of and proximately caused by his exposure to heat while Mr. Woodson was confined at the Richmond City Jail. All of Dr. Robert's opinions were formed in the course of treatment.

Plaintiff also expressly reserves the right to supplement and enlarge this disclosure, or to submit amended opinions from Dr. Roberts in response to the expert disclosures and testimony submitted by any Defendant in this case.

All of Dr. Robert's opinions in this case will be expressed in conjunction with his areas of expertise and will be offered to a reasonable degree of medical certainty. Plaintiff reserves Dr. Robert's right to explain or enlarge his opinions during testimony at deposition or trial. Plaintiff reserves Dr. Robert's right to use demonstrative evidence, illustrations, video, animations, charts, or other reasonable means to assist the trier of fact in understanding his opinions in this case.

**Respectfully submitted,  
STEFAN WOODSON**

/s/

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Jonathan E. Halperin, Esq. (VSB No. 32698)  
Halperin Law Center, LLC  
5225 Hickory Park Drive, Suite B  
Glen Allen, VA 23059  
(804) 556-4898  
(866) 335-1502 (f)  
jonathan@halperinlegal.com

Seth R. Carroll, Esq. (VSB No. 74745)  
Commonwealth Law Group  
1506 Staples Mill Road, Suite 202  
Richmond, VA 23230  
(804) 551-9650  
(804) 716-5031 (f)  
scarroll@hurtinva.com  
*Counsel for Plaintiff Stefan Woodson*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 2nd day of September, 2014, I sent a copy of the foregoing electronically to:

Edward J. McNelis, III, Esq.  
Isaac A. McBeth, Esq.  
Grace M. Brumagin, Esq.  
Rachel L. Procopio, Esq.  
Rawls, McNelis & Mitchell, P.C.  
211 Rocketts Way, Suite 100  
Richmond, VA 23231  
Phone: (804) 344-0038  
Fax: (804) 782-0133  
emcnelis@rawlsmcnelis.com  
imcbeth@rawlsmcnelis.com  
gbrumagin@rawlsmcnelis.com  
rprocopio@rawlsmcnelis.com  
*Attorneys for Motsumi Moja,  
Correct Care Solutions, John Davis, et al.*

Jeff W. Rosen, Esq.  
Jeffrey A. Hunn, Esq.  
Pender & Coward  
222 Central Park Avenue  
Virginia Beach, VA 23462  
(757) 490-3000/(757) 502-7351  
jrosen@pendercoward.com  
*Attorneys for C.T. Woody, Jr., Sheriff*

David P. Corrigan, Esq.  
Jeremy D. Capps, Esq.  
Maurice S. Fisher, Jr., Esq.  
Harman, Claytor, Corrigan & Wellman  
P. O. Box 70280  
Richmond, Virginia 23255  
Phone: (804) 747-5200  
dcorrigan@hccw.com  
jcapps@hccw.com  
sfisher@hccw.com  
*Attorneys for City of Richmond*

Kyle R. Elliott, Esq.  
Office of the Richmond City Attorney  
Richmond, Virginia 23219  
Phone: (804) 646-7946  
Fax: (804) 646-7939  
Kyle.elliott@richmondgov.com  
*Attorneys for City of Richmond*

Thomas D. Lane, Esq.  
Thompson McMullan PC  
100 Shockhoe Slip, 3rd Floor  
Richmond, Virginia 23219  
Phone: (804) 698-6206  
tlane@t-mlaw.com  
*Attorneys for Abraham Bul, Donald Palmer  
and John Whitaker*

Cynthia Santoni, Esq.  
Eric Burns, Esq.  
Wilson, Elser, Maskowitz, Edelman & Dicker,  
LLP  
8444 Westpark Drive Suite 510  
McLean, Virginia 22102  
(703) 245-9300  
cynthia.santoni@wilsonelser.com  
eric.burns@wilsonelser.com  
*Attorneys for Marian Williams*

Marshall Ross, Esq.  
Goodman, Allen & Filetti, PLLC  
4501 Highwoods Parkway, Suite 210  
Glen Allen, Virginia 23060  
(804) 565-6813  
(804) 346-5954 (f)  
mross@goodmanallen.com  
*Attorneys for Natasha Briggs  
and Joett Vernon-Ramsey*

Leslie A. Winneberger, Esquire  
William Fisher Etherington, Esquire  
Beale Davidson Etherington & Morris, PC  
701 E. Franklin Street, Suite 1200  
Richmond, VA 23219  
(804) 788-1500  
(804) 788-0135 (f)  
lwinneberger@bealelaw.com  
wetherington@beallaw.com  
*Attorneys for Johnny Scott, Daniel  
Quinney, Edward Moody,  
and Tristan Brown*

Kimberly A. Satterwhite, Esq.  
Todd D. Anderson, Esq.  
Herbert & Satterwhite, P.C.  
7201 Glen Forest Drive, Suite 203  
Richmond, Virginia 23255  
(804) 554-1800  
(804) 554-1801 (f)  
ksatterwhite@herbertsatterwhite.com  
tanderson@herbertsatterwhite.com  
*Attorneys for Robert Cushionberry*

/s/  
Jonathan E. Halperin